

Exhibit 19

Page 1

1 JENNIFER JEHN

2 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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4 SANDRA GUZMAN,

5 Plaintiff,
6 -against- 09CIV9323 (BSJ) (RLE)
7 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a
THE NEW YORK POST, and COL ALLAN, in his
official and individual capacities,

8

Defendants.

9 -----X

10 AUSTIN FENNER and IKIMULISA LIVINGSTON,

11

12 Plaintiffs,
13 -against- 09CIV9832 (BSJ) (RLE)
14 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a
THE NEW YORK POST and DAN GREENFIELD and
MICHELLE GOTTHELF,

15 Defendants.

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18 VIDEOTAPED DEPOSITION OF JENNIFER JEHN
19 New York, New York
20 Tuesday, June 26, 2012

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22 REPORTED BY: BARBARA R. ZELTMAN
(BOBBIE)
23 Professional Stenographic Reporter
24
25 Job Number: 51052

<p style="text-align: right;">Page 246</p> <p>1 JENNIFER JEHN 2 And did Amy do that? Did she look 3 at other options? 4 MR. LERNER: Objection. 5 A I believe she did. 6 Q Did you speak to any other editor 7 at The New York Post about the possibility 8 of transferring Sandra Guzman to another 9 job? 10 A I did not. 11 Q Did you ever speak to Paul Carlucci 12 about the possibility of transferring Sandra 13 Guzman to another job? 14 A I did not. 15 Q Other than Amy, did you speak to 16 anyone else at all about the possibility of 17 transferring Ms. Guzman to another job? 18 A I didn't. 19 Q Did you ever tell Col Allan that 20 Sandra Guzman had complained about the 21 cartoon in February? 22 A Yes. 23 Q When did you tell Col Allan that? 24 A Around after the cartoon. 25 Q In February 2009?</p>	<p style="text-align: right;">Page 247</p> <p>1 JENNIFER JEHN 2 A Yes. 3 Q How soon after the cartoon was 4 published do you think you had the 5 conversation? 6 A Within a couple days. 7 Q And what did you tell Col Allan 8 about Sandra Guzman's complaint? 9 A I told Col Allan that Sandra 10 complained about the content of the cartoon 11 being published. 12 Q And did you speak to Col Allan in 13 person? 14 A No. 15 Q Did you speak to him over the 16 phone? 17 A Yes. 18 Q Did he call you or did you call 19 him? 20 A I don't recall. 21 Q Do you recall anything else you 22 told Col Allan about Sandra Guzman's 23 complaint? 24 A I told Col Allan that employees 25 were upset about the content of the cartoon.</p>
<p style="text-align: right;">Page 248</p> <p>1 JENNIFER JEHN 2 Q Did you name other employees in 3 addition to Sandra Guzman? 4 A I don't recall. 5 Q So as you sit here today, the only 6 employee you can recall specifically 7 speaking to Col Allan about in reference to 8 the cartoon was Sandra Guzman? 9 A Yes. 10 Q And what was Col Allan's reaction? 11 A He said "Okay" and "Thank you." 12 Q That's it? 13 A Yes. 14 Q Why did you tell Col Allan about 15 this situation with Sandra Guzman? 16 MR. LERNER: Objection. 17 A I told Col Allan about Sandra being 18 upset about the content of the cartoon 19 because she was upset. 20 Q I don't follow. Why did you tell 21 Col Allan that? 22 A I told Col because Sandra was more 23 upset. 24 Q I'm sorry. I'm just not following 25 you.</p>	<p style="text-align: right;">Page 249</p> <p>1 JENNIFER JEHN 2 What was your reasoning that you 3 thought that you should tell Col Allan as 4 opposed to everyone else at the paper? 5 MR. LERNER: Objection. 6 A I told Col Allan because he was/is 7 the editor of The New York Post. 8 Q Do you think that he would want to 9 know about Sandra Guzman complaining about 10 the cartoon? 11 A Yes. 12 Q Why do you think he would want to 13 know about it? 14 A I think he would want to know about 15 employees complaining about the content of 16 the cartoon and I think he would want to 17 know about Sandra complaining about the 18 cartoon. 19 Q And specifically why would he want 20 to know about Sandra complaining about the 21 cartoon? 22 MR. LERNER: Objection. 23 Q If you know. 24 A I don't know specifically why he 25 would want to know. I don't know --</p>

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SANDRA GUZMAN,)
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 Plaintiff,)
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 -against-) 09 CV 9323
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NEWS CORPORATION, NYP HOLDINGS,)
INC., d/b/a THE NEW YORK POST,)
and COL ALLAN, in his official)
and individual capacities,)

10

Defendants.)

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AUSTIN FENNER and IKIMULISA)
LIVINGSTON,)
)
 Plaintiffs,)
)
 -against-) 09 CV 9832
)

14

NEWS CORPORATION, NYP HOLDINGS,)
INC., d/b/a THE NEW YORK POST)
and DAN GREENFIELD and)
MICHELLE GOTTHELF,)

17

Defendants.)

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CONTINUED
DEPOSITION OF JENNIFER JEHN
New York, New York
Thursday, February 14, 2013

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Reported by:
FRANCIS X. FREDERICK, CSR, RPR, RMR
JOB NO. 57921

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<p style="text-align: right;">Page 10</p> <p>1 J. JEHN 2 work performance or, you know, not her 3 supervisor. So I would be speculating on if 4 she was passionate. 5 Q. At any time did you observe Ms. 6 Guzman in the carrying out of her job duties? 7 A. No. 8 Q. Did you ever review any of Ms. 9 Guzman's work product, whether in a 10 professional capacity or just as a reader? 11 MR. LERNER: By review it do you 12 mean critically review it or see it? 13 MR. PEARSON: See it. 14 A. Yes. I've seen the Tempo section 15 in the paper. 16 Q. Okay. And what was your opinion 17 of the content of Tempo? 18 A. My opinion of the Tempo content is 19 that it was good. 20 Q. Did Ms. Guzman work on other 21 sections of the paper other than Tempo? 22 A. I don't recall. 23 Q. Was Ms. Guzman involuntarily 24 terminated from her work at The New York Post? 25 A. I don't understand what you mean</p>	<p style="text-align: right;">Page 11</p> <p>1 J. JEHN 2 by involuntary. 3 Q. Well, did Ms. Guzman at some point 4 depart her employment at The New York Post? 5 A. The section that Ms. Guzman was 6 working on, Tempo, a business decision was 7 made that that section was going to no longer 8 be a monthly section because it wasn't 9 profitable or the revenue picture was not -- 10 did not look good. And as a result of that 11 Ms. Guzman's position was eliminated. 12 Q. And Ms. Guzman's employment at The 13 New York Post ended as a result of that? 14 A. Well, the business decision was 15 made that the Tempo section was going to no 16 longer publish at the same frequency that it 17 was currently being published at. And as a 18 result of that her -- the position of Tempo 19 editor was eliminated. 20 Q. And as a result she was no longer 21 an employee of The Post; is that right? 22 A. Yes. 23 Q. Was Ms. Guzman ever considered for 24 another position with The Post? 25 MR. LERNER: Objection.</p>
<p style="text-align: right;">Page 12</p> <p>1 J. JEHN 2 A. I don't -- 3 MR. LERNER: Ever? 4 Q. At the time that the 5 termination -- at the time that the decision 6 was made to eliminate her position, was she 7 considered for transfer to any other position? 8 A. I directed my VP of Human 9 Resources at the time, Amy Scialdone, yes, to 10 look at options, other options for Ms. Guzman 11 for other options for work. 12 Q. And what options, if any, were 13 considered? 14 A. I don't recall. 15 Q. Did you discuss that search for 16 other options with Amy at any point? 17 A. I did not in detail. She reported 18 back to me that there weren't any other 19 positions available. 20 MR. LERNER: One second. 21 (Conference between counsel and 22 witness.) 23 Q. And did Ms. Scialdone tell you the 24 process that she had gone through to determine 25 that there were no other positions available?</p>	<p style="text-align: right;">Page 13</p> <p>1 J. JEHN 2 A. I don't recall. 3 Q. How was the elimination of Ms. 4 Guzman's position communicated to her, if it 5 ever was? 6 A. I don't recall. 7 Q. Was Tempo the only section of the 8 paper that had a poor revenue picture at the 9 time of Ms. Guzman's departure from The New 10 York Post? 11 MR. LERNER: Objection. 12 A. I don't recall. 13 Q. Was any part of Ms. Guzman's job 14 duties at The New York Post around the time of 15 her purported job elimination the selling of 16 ads for any section of the paper? 17 MR. LERNER: Objection. 18 A. I don't understand what you're 19 asking me. 20 Q. Sure. At any point during Ms. 21 Guzman's employment with The Post was she 22 responsible for selling advertisements for the 23 paper? 24 MR. LERNER: Objection. 25 A. I don't -- I don't -- I don't</p>

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Page 15

1 J. JEHN
2 recall.

3 Q. So at the time of her departure
4 from The New York Post, was she in any
5 capacity responsible for selling
6 advertisements in the paper?

7 A. I don't believe so.

8 Q. Did any employee of The New York
9 Post inquire with you about the reason for Ms.
10 Guzman's termination?

11 A. No.

12 Q. Did any employee of The New York
13 Post inquire with any other HR or Legal
14 personnel at The New York Post about Ms.
15 Guzman's termination?

16 MR. LERNER: Objection.

17 A. Can you repeat that question?

18 Q. Sure. Did any other The New York
19 Post employee, apart from counsel, inquire
20 with you about the reason for Ms. Guzman's
21 termination?

22 A. What do you mean --

23 MR. LERNER: Okay. Hold on. That
24 was the same question as two questions
25 ago. She asked you to restate the

1 J. JEHN
2 question. I think you asked a different
3 question.

4 MR. PEARSON: My understanding is
5 that this should be a church mouse
6 situation. If you have an objection,
7 state the objection. This is a continued
8 deposition. We're covering a lot of
9 material.

10 BY MR. PEARSON:

11 Q. Following Ms. Guzman's departure
12 from The Post, did any The New York Post
13 employee, apart from counsel or anyone
14 involved in the instant lawsuit, inquire with
15 you about the reason for Ms. Guzman's
16 termination?

17 A. No.

18 MR. LERNER: Objection.

19 A. No.

20 Q. Did anyone inquire about such
21 matters with any other member of Human
22 Resources, to your knowledge?

23 MR. LERNER: Objection.

24 Q. Following Ms. Guzman's departure.

25 A. To my knowledge, no.

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Page 17

1 J. JEHN

2 Q. Did you or any other member of New
3 York Post's -- of The New York Post's Human
4 Resources personnel speak to any member of the
5 media concerning Ms. Guzman's termination?

6 MR. LERNER: Objection.

7 A. No.

8 Q. Did The New York Post continue to
9 publish Tempo following Ms. Guzman's departure
10 from The Post?

11 A. No.

12 Q. Had the decision to cancel Tempo
13 entirely been made at the time of Ms. Guzman's
14 departure from the paper?

15 MR. LERNER: Objection.

16 A. At the time of Ms. Guzman's
17 departure there was a recommendation that the
18 frequency of the Tempo section would be --
19 most likely be reduced.

20 Q. So it had been decided it would be
21 reduced but not eliminated entirely; is that
22 correct, my understanding?

23 MR. LERNER: Objection.

24 A. It was recommended that it would
25 be reduced in frequency.

1 J. JEHN

2 Q. And was a decision made at any
3 point to cancel Tempo entirely and stop
4 publishing it at The Post?

5 A. I was no longer at The Post a few
6 months after that so I don't have any
7 knowledge of that. But I do know that the
8 section was not published.

9 Q. Okay. Were you present in any
10 meeting in which Ms. Guzman was informed that
11 she would no longer be working at The New York
12 Post?

13 A. No.

14 Q. Did you discuss any such meeting
15 with Ms. Guzman with any other employee of The
16 New York Post?

17 A. Could you repeat that question,
18 please?

19 Q. Sure. Did you discuss any meeting
20 with Ms. Guzman about her departure from The
21 Post with anyone else?

22 MR. LERNER: I'm going to object
23 to the form but you can answer it.

24 A. It's possible I may have discussed
25 that with Amy Scialdone.